

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBEBRASKA**

UNITED STATES OF AMERICA, ex)	
rel. JOHN P. RAYNOR,)	
)	
Relator,)	
V.)	Case No. 8:08-CV-48
)	
NATIONAL RURAL UTILITIES)	
COOPERATIVE FINANCE CORPORATION,)	
el al.)	
)	
Defendants.)	

RELATOR’S MOTION FOR AN ENLARGEMENT OF TIME

COMES NOW, RELATOR, by and through his counsel of record and pursuant to Local Rule 6.1(a) moves the Court for an enlargement of time of fourteen (14) days, or until February 28, 2011, in which to respond to the individual Motions to Dismiss. In support for this Motion for extension, Realtor’s Counsel respectfully submits:

1. Realtor’s Counsel this day is timely filing the response to Defendant National Rural Utilities Cooperative Finance Corporation’s (“CFC”) Motion to Dismiss (DE 117) and the Joint Memorandum of Law (DE 118) which is ninety-seven pages, advancing numerous legal arguments submitted on behalf of not only CFC, but all of the fourteen defendants.

2. Relator is represented by three attorneys¹, with limited staff, who require additional time to address both the Joint Memorandum of Law (DE 118) due this date (pursuant to the Judge’s “November 15, 2010” Memorandum and Order (DE 105)), and the Motion to

¹ A sole practitioner and the firm of Rensch & Rensch Law that consists of two attorneys.

Dismiss (MTD) submitted by individual defendants, to wit:

- a. The MTD (DE 118) and Memorandum of Law (MOL) submitted on behalf of Defendants Deloitte & Touche LLP (“Deloitte”), Randall B. Johnston, and Ernst & Young LLP (“E&Y”) (together, the “Auditor Defendants”);
- b. The MTD (DE 132) and MOL submitted on behalf of Defendants National Rural Electric Cooperative Association (“NRECA”) and Glenn L. English (“English”);
- c. The MTD (DE 130) and MOL submitted on behalf of Defendants, The McGraw-Hill Companies, Inc., Moody’s Corporation, Moody’s Investors Service, Inc., and Fitch, Inc. (collectively, the “Rating Agencies”); and
- d. The MTDs and the MOLs submitted on behalf of Defendant CFC’s management, Defendants Sheldon C. Petersen (DE 121), Steven L. Lilly (DE 119), John J. List (DE 123).

Collectively, the Individual Defendants MTD raise defenses particular to their individual status.

3. Relator’s Counsel has made successful attempts at conferring with and obtaining an agreement to a two-week extension from all of the Defendants except one (1). Those Defendants who have agreed to this request are asking Relator to request a similar time extension for defendants to rebut Relator’s brief. Relator agreed and asks the court allow a two-week extension of time for those Defendants to submit their respective reply brief(s). Relator’s counsel has not received a response from Defendant, McGraw-Hill Companies, Inc.

4. Relator is hereby requesting, as part of this motion, that if the court is inclined to grant this motion, that all of the Defendants be granted a two-week extension for submitting their respective reply brief(s).

5. Realtor’s Counsel is not seeking this extension in bad faith or for purposes of

delay.

6. Relator's Counsel is submitting this Motion before the respective responses are due.

7. This is Realtor's counsels' first request for an extension of time relating to the Judge's "November 15, 2010" Memorandum and Order (DE 105).

WHEREFORE, Relator prays for an additional period of fourteen (14) days to respond to the above reference Motions to Dismiss and if the Court decides to grant this motion, that all of the Defendants, be granted an additional fourteen (14) days to submit their respective reply brief(s).

Dated: February 14, 2011.

UNITED STATES OF AMERICA, ex rel.
JOHN P. RAYNOR,

By: /S/
Richard J. Rensch, #15515
RENSCH & RENSCH LAW, PC, LLO
John D. Wear Building
7602 Pacific Street, Suite 102
Omaha, NE 68114
(402) 498-4400
rensch@renschrensch.com

And,

Alexander Angueira, Esq.
Alexander Angueira, P.L.L.C.
Plaza 57, 7301 S.W. 57th Court
Suite 515
South Miami, FL 33143
Office: (305) 357-9031

ATTORNEYS FOR RELATOR

CERTIFICATE OF SERVICE

It is hereby certified that on February 14, 2011, the foregoing Motion was filed with the Clerk of the Court using the CM/ECF filing system effecting service upon those parties presently entitled to Notice.

/s/ Richard J. Rensch